

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DENNIS J. SOLOMON, *

Plaintiff, *

v. *

Civil Action No. 04-12499WGY

CHARLES VEST, *et al.*, *

Defendants. *

**MOTION TO ADMIT ATTORNEYS JOEL A. FEUER
AND SARAH R. WETZSTEIN PRO HAC VICE REGARDING A LIMITED
APPEARANCE FOR DEFENDANT UNIVERSITY OF SOUTHERN CALIFORNIA**

Pursuant to LR 83.5.3(b), the undersigned counsel in the above-captioned matter moves for the admission *pro hac vice* of Joel A. Feuer, Esq. and Sarah R. Wetzstein, Esq., attorneys with the law firm of Gibson, Dunn & Crutcher LLP, in Los Angeles, California, for the purpose of filing and arguing a motion to dismiss based on lack of personal jurisdiction. Defendant University of Southern California does not waive the defense of personal jurisdiction. The undersigned submits that his law firm will associate with Mr. Feuer and Ms. Wetzstein in connection with this particular matter in order to advise them of local procedures and rules applicable to the conduct of this case on behalf of defendant University of Southern California.

Mr. Feuer is a member in good standing of the Bar of the State of California and before the United States Court of Appeals for the Ninth Circuit and the United States District Court for the Northern District of California. There are no disciplinary proceedings pending against Mr. Feuer in any jurisdiction, and Mr. Feuer is familiar with the Local Rules of this Court.

Ms. Wetzstein is a member in good standing of the Bar of California and before the United States District Court for the Central District of California. There are no disciplinary proceedings pending against Ms. Wetzstein in any jurisdiction, and Ms. Wetzstein is familiar with the Local Rules of this Court.

The affidavits of Mr. Feuer and Ms. Wetzstein attesting to the foregoing are submitted herewith.

UNIVERSITY OF SOUTHERN CALIFORNIA

By its attorneys,

MORISI & OATWAY, P.C.

DATED: _____

/s/ Amanda P. O'Reilly

Andrew C. Oatway BBO# 561885

Amanda P. O'Reilly BBO# 641378

MORISI & OATWAY, P.C.

1400 Hancock Street, 3rd Floor

Quincy, MA 02184

Voice 617.479.0400

Fax 617.479.6885

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the plaintiff by US Mail on the date set forth below.

DATED: _____

Amanda P. O'Reilly

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DENNIS J. SOLOMON,
Plaintiff,

v.

CHARLES VEST, *et al.*,
Defendants.

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Civil Action No. 04-12499WGY

**AFFIDAVIT OF JOEL A. FEUER, ESQ., IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

I, Joel A. Feuer, on personal knowledge and under oath state as follows:

1. Pursuant to Local Rule 83.5.3(b), I apply for *pro hac vice* admission to appear and practice in this action on behalf of defendant University of Southern California.

2. I am a partner with the firm of Gibson, Dunn & Crutcher LLP with a business address of 2029 Century Park East, 40th Floor, Los Angeles, California, 90067, phone: 310.551-8808 and fax: 310.552.7058.

3. I have been a member in good standing of the State Bar of California since December 1, 1981.

4. I am admitted to practice in all courts of the State of California, the United States Court of Appeals for the Ninth Circuit, and before the United States District Court for the Northern District of California.

5. No disciplinary proceeding has been instituted against me in any jurisdiction.

6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts, and this Affidavit is on motion of a member of the bar of this Court.

Signed under the pains and penalties of perjury this _____ day of March, 2005.

/s/ Joel A. Feuer
Joel A. Feuer

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the plaintiff by US Mail on the date set forth below.

DATED: _____

Amanda P. O'Reilly

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DENNIS J. SOLOMON,
Plaintiff,

v.

CHARLES VEST, *et al.*,
Defendants.

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Civil Action No. 04-12499WGY

**AFFIDAVIT OF SARAH R. WETZSTEIN, ESQ., IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

I, Sarah R. Wetzstein, on personal knowledge and under oath state as follows:

1. Pursuant to Local Rule 83.5.3(b), I apply for *pro hac vice* admission to appear and practice in this action on behalf of defendant University of Southern California.
2. I am an associate with the firm of Gibson, Dunn & Crutcher LLP with a business address of 2029 Century Park East, 40th Floor, Los Angeles, California, 90067, phone: 310.552.8691 and fax: 310.552.7061.
3. I have been a member in good standing of the State Bar of California since 2001.
4. I am admitted to practice in all courts of the State of California and the United States District Court for the Central District of California.
5. No disciplinary proceeding has been instituted against me in any jurisdiction.
6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts, and this Affidavit is on motion of a member of the bar of this Court.

Signed under the pains and penalties of perjury this _____ day of March, 2005.

/s/Sarah R. Wetzstein

Sarah R. Wetzstein

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the plaintiff by US Mail on the date set forth below.

DATED: _____

Amanda P. O'Reilly